

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

<b>AVRAHAM ABADA, TARA GREAVES, EUGENE RODRIGUES,</b>  <b>-against-</b> <b>DELTA AIR LINES, INC.,</b>	<b>Plaintiffs,</b>  <b>Defendant.</b>	<b>Case Action Nos.</b> <b>19-cv-03903-KAM-VMS</b> <b>19-cv-03904-KAM-VMS</b> <b>19-cv-03962-KAM-VMS</b>  <i>Oral Argument Requested</i>
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**NOTICE OF DEFENDANT DELTA AIR LINES, INC.’S  
MOTION TO DISMISS THE AMENDED COMPLAINTS**

**PLEASE TAKE NOTICE** that Defendant Delta Air Lines Inc. (“Delta” or the “Defendant”), pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, the Local Rules for the United States District Courts for the Southern and Eastern Districts of New York, the Individual Chambers Practices of this Court, the Court’s Minute Order of April 2, 2020, the accompanying Memorandum of Law in Support of Defendant’s Motion to Dismiss the Amended Complaints, dated May 8, 2020, and upon all papers and proceedings previously had herein, will move this Court before the Honorable Kiyo A. Matsumoto, United States District Judge at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, at a date and time to be determined by the Court, for an Order granting Defendant’s Motion to Dismiss the Amended Complaints in their entirety with prejudice on all of Plaintiff’s claims, and any further relief as this Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's Minute Order of April 2, 2020, Plaintiffs are to serve their opposition papers on or before June 5, 2020, and Defendant is to serve its reply, and file all papers in logical order on ECF, on or before June 17, 2020.

Dated: New York, New York

Respectfully submitted,

May 8, 2020

**MORGAN, LEWIS & BOCKIUS LLP**

By: /s/ Ira G. Rosenstein

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*Attorneys for Defendant Delta Air Lines, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 8, 2020, I caused to be served, true and correct copies of Defendant Delta Air Lines, Inc.'s Notice of Motion and accompanying Memorandum of Law in Support of Delta's Motion to Dismiss the Amended Complaints on the following via email and Secure File Transfer protocol:

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